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December 10, 2011

VIA E.C.F. & FIRST CLASS MAIL

The Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bartolomeo Vernace, et al.
11 CR 005 (S-1) (SLT)

Dear Judge Townes:

I am writing to respectfully request that the current motion schedule be adjusted for two weeks to provide all defense counsel with sufficient opportunity to complete review of the voluminous discovery provided by the government thus far.

The current motion schedule requires defense motions to be filed on December 15, 2011, the government's response by January 31, 2012 and a defense reply by February 15, 2012.

The discovery to date consists of over 10,000 documents and many cds consisting of hundreds of conversations. All defense counsel have been working diligently in their efforts to review and prepare the discovery. However, the process has taken longer than expected considering the sheer quantity of material. An additional two weeks will provide defense counsel with sufficient opportunity to complete discovery review and file the appropriate motions.

I have spoken with all defense counsel and they join in this application. Furthermore, my co-counsel has spoken to AUSA Stephen Frank and he has no objection to the proposed extension.

Honorable Sandra L. Townes
December 10, 2011
Page 2 of 2

Therefore, it is respectfully requested that this Court grant an extension of the motion schedule as follows: Defense Motions due by December 29, 2011; Government Response due by February 14, 2012; and Defense Reply by February 30, 2012.

Thank you for your consideration in this matter.

Respectfully submitted,

/S/

Charles F. Carnesi

cc: All Counsel,

Mr. Evan Norris,
Assistant United States Attorney
(Via Email & ECF)